

December 23, 2022

VIA CM/ECF

The Honorable Richard G. Andrews
U.S. District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801-3555

Re: *National Union Fire Insurance Co. of Pittsburgh, PA, et al., v. Boy Scouts of America & BSA, LLC*, Case No. 22-cv-01237-RGA

Dear Judge Andrews:

Pursuant to the Court's December 13, 2022 Oral Order, the parties in this consolidated appeal file this joint letter identifying the following proposed issues for oral argument and the proposed allotted time for each issue. The parties have been unable to agree on an allocation of time for the appeal.

Appellants State: In light of the significance and complexity of the issues presented in this consolidated appeal, the Appellants (the Certain Insurers, the Allianz and Liberty Insurers, the Lujan Claimants and the Dumas & Vaughn Claimants) request that the Court hear oral argument on all of the issues on appeal, as set forth in issues 1-8 below. With the proposed time allotments, Appellants' proposal is for a total hearing time of five hours.

Appellees State: In light of the extensive briefing and the focus of the arguments, the Appellees' proposal is for a 3 hour and 10 minute hearing that limits oral argument to issues 1-3. Alternatively, Appellees suggest that the Court divide time equally between the Appellants and the Appellees for whatever length hearing the Court determines to be appropriate, and the parties will use their time as instructed by the Court or otherwise however they see fit.

Issues on Appeal:

1. **Good Faith.** This issue will be addressed by (i) the Certain Insurers, and (ii) BSA and the Plan Supporters. Proposed time: 30 minutes for Appellants; 30 minutes for Appellees.
2. **Assignment of Insurance Contract Rights and Obligations.** This issue will be addressed by (i) the Certain Insurers, and (ii) BSA and the Plan Supporters. Proposed time: 20 minutes for Appellants; 20 minutes for Appellees.
3. **Third Party Releases and Channeling Injunctions (Subject Matter Jurisdiction, Statutory Authority, and Hallmarks/*Master Mortgage*).** These issues will be addressed by (i) the Lujan Claimants and the Dumas & Vaughn Claimants, and (ii) BSA and the Plan

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Supporters. Proposed time: 45 minutes for Appellants; 45 minutes for Appellees.

4. **Indirect Abuse Claims & Judgment Reduction.** These issues will be addressed by (i) the Allianz and Liberty Insurers, and (ii) BSA and the Plan Supporters. Proposed time: 10 minutes for Appellants; 10 minutes for Appellees.
5. **Treatment of Current and Future Claimants.** These issues will be addressed by (i) the Dumas & Vaughn Claimants, and (ii) BSA and the Plan Supporters. Proposed time: 5 minutes for Appellants; 5 minutes for Appellees.
6. **The Insurance Settlements.** These issues will be addressed by (i) the Lujan Claimants, and (ii) BSA and the Plan Supporters. Proposed time: 20 minutes for Appellants; 20 minutes for Appellees.
7. **Automatic Stay.** These issues will be addressed by (i) the Lujan Claimants and (ii) BSA and the Plan Supporters. Proposed time: 5 minutes for Appellants; 5 minutes for Appellees.
8. **Best Interests of Creditors, Classification, Equal Treatment and Plan Amendment.** These issues will be addressed by (i) the Lujan Claimants and (ii) BSA and the Plan Supporters. Proposed time: 15 minutes for Appellants; 15 minutes for Appellees.

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